

REMARKS

Claims 57-61 have been added.

Claims 48-61 are pending for further examination.

In the Office action, the claims were rejected as follows:

(1) Claim 48 was rejected under 35 U.S.C. §102(a) as anticipated by U.S. Patent No. 6,896,255 (Fick et al.).

(2) Claims 49, 52-54 and 56 were rejected 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 5,372,361 (Isobe et al.) in view of U.S. Patent No. 6,286,629 (Saunders).

(3) Claims 50-51 and 55 were rejected 35 U.S.C. §103(a) as unpatentable over the Isobe et al. patent in view of the Saunders patent and further in view of the Fick et al. patent.

Applicant respectfully requests reconsideration.

Independent claim 48 recites a stacker mechanism for a cassette to store banknotes and the like. The stacker mechanism includes a drive means that includes non-circular drive gears.

An example is illustrated in FIG. 18C. The Office action alleges that the Fick et al. patent discloses such drive gears. Applicant respectfully disagrees. All the gear wheels disclosed in the Fick et al. patent, including drive wheels 54, appear to be circular (*see, e.g.*, FIGs. 1 and 2). At least for this reason, the rejection of claim 48 should be withdrawn.

Likewise, the rejection of claim 50, which also recites non-circular drive gears, should be withdrawn.

New dependent claims 57, 59 and 60 recite that each non-circular drive gear has a profile such that its operating radius varies with angle as the gear rotates. Support for this feature can be found, for example, in the specification at page 8, lines 13-14. The cited references, including the Fick et al. patent, do not disclose such a feature or render obvious the subject matter of claims 57, 59 and 60. Accordingly, those claims should be allowed.

Independent claim 49 recites a stacker mechanism with a scissors arrangement. A link arm is connected to the scissors arrangement in a particular way (*i.e.*, at a pivot point located between the scissor pivot point that connects the two scissor arms and the end of one of the scissor arms that is slidably connected to the frame). An example is illustrated FIGs. 18A and 18B in which reference numeral 36 identifies the link arm. Potential advantages of this arrangement are described in connection with FIGs. 14 and 15 and facilitate obtaining a relatively large scissor stroke in a compact stacker for banknotes and the like where space is limited (page 7, lines 19-23):

The present implementation, however, obtains a maximum scissor stroke within a small height, wherein the height is primarily constrained by the radius of the crank mechanism. In particular, use of an offset between points (G) and (F) permits some amplification of the scissor stroke, such that a reduced thickness or compact stacking mechanism (29) is obtained.

The Isobe et al. patent discloses a scissors arrangement. Specifically, the Isobe patent discloses a pusher 30 that has a pushing plate 32 and a base plate 31 (FIG. 4). The pushing plate 32 is moved toward or away from the base plate 31 using a pair of linked members 33, 33' connected to one another by an axle 34. The only component connected to the link member 33 for the purpose of causing movement of the link member is the movable shaft 33b. The shaft 33b, however, is connected to an end of the link member 33. Therefore, as acknowledged by the Office action, the Isobe patent fails to disclose a link arm connected at a pivot point as recited in claim 49 (as well as claims 51 and 53).

The Office action, however, relies on the Saunders patent for its disclosure of a hydraulic ram 9 connected to one of the scissor legs (*see* FIG. 1).

Applicant submits that the Office action has not established a *prima facie* case for obviousness because no reason is provided as to why one of ordinary skill would have modified the arrangement of the Isobe et al. patent to incorporate the hydraulic ram 9 of the Saunders

patent. The Office action simply alleges that it would have been obvious to do so "for the purpose of activating said stacking plate." Yet, the Isobe et al. patent itself provides a mechanism to accomplish that very function. Thus, there would have been no reason to complicate the arrangement of the Isobe et al. patent by adding components to accomplish a function the apparatus of the Isobe et al. patent already performs.

Furthermore, incorporating the hydraulic ram 9 and hydraulic cylinder 10 (or other mechanism) of the Saunders patent into the bill handling apparatus of the Isobe et al. patent would not have occurred to one of ordinary skill and would not have made sense. In contrast to the Isobe et al. patent, which relates to bill handling apparatus, the Saunders patent relates to the field of position measurement systems (col. 1, lines 6-8), which are intended for use in fork-lifts, elevators and scissor-lifts (col. 1, lines 15-16). Such systems are intended to position large payloads such as "personnel, materiel, and equipment" at different heights (col. 1, lines 22-25). An example disclosed in the Saunders patent is an elevator used to convey payloads between different floors in a factory (col. 1, lines 26-27). A person of ordinary skill would not have considered using arrangements for such large lift-positioning systems in the much smaller bill handling apparatus of the Isobe et al. patent where space is typically at a premium. Applicant submits that the Saunders patent is not in the same or an analogous field and, even if it were, a person of ordinary skill would not have considered the hydraulic or other lift arrangements disclosed by Saunders as appropriate for bill handling apparatus such as those disclosed by the Isobe et al. patent or claimed in the pending application.

Additionally, the Isobe et al. patent repeatedly emphasizes that one of its objects is to provide a bill handling apparatus with an exchangeable pusher for the stacker in a way that makes it easy to remove the pusher and replace it with another (*see, e.g.*, col. 1, lines 61-64; col. 2, lines 3-5). The arrangements disclosed in the Saunders patents would make it much more difficult to achieve the stated objects of the Isobe et al. patent.

In view of the foregoing remarks, applicant submits that the subject matter of the pending claims would not have been obvious from the Isobe et al. patent, the Saunders patent or the Fick

et al. patent, alone or in combination. Therefore, the rejections of independent claim 49, 51 and 53, as well as their dependent claims, should be withdrawn.

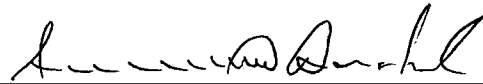
Applicant further notes that new dependent claims 58 and 61 recite that the link arm is connected to a crankshaft operable to rotate about a fixed center. The cited references do not disclose such an arrangement.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

The Petition for Extension of Time fees are being paid by way of Deposit Account authorization via the EFS System. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

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